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August 9, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Communications--WC Docket No. 17-84; WC Docket No. 17-200; RM-11791

Dear Ms. Dortch:

This is to notify you pursuant to Section 1.1206 of the Commission's Rules that on August 8, 2017 the undersigned along with Aryeh Fishman Associate General Counsel and Chris Hickling Director Government Relations of the Edison Electric Institute met with Jay Schwartz Wireline Advisor to Chairman Pai in connection with the above-referenced proceedings.

EEI's representatives discussed the multi-billion dollar investment that the electric industry is making in order to modernize this nation's power grid. They noted that this new smart energy infrastructure has been enabled by the convergence of energy and telecommunications technologies and that the industry's reliance on communications is increasing. Further, they pointed out that as a result these converged technologies, electric companies have made a commitment to and begun to partner with localities and others to develop smart communities.

EEI's representatives urged that the Commission not take any actions in the above-referenced proceedings which would negatively impact upon public safety and the provision of reliable electric service, or impair ongoing grid modernization and the growth of smart communities. More specifically, they requested that the membership of the Broadband Deployment Advisory Committee be expanded to include more representation from electric companies and states so that pole attachment and broadband issues could be considered in a larger context. They indicated that there was no need for the Commission to adjust the pole attachment timelines or rates because make-ready delays are generally caused by new and existing attachers and not the companies, and that lowering the rates would discourage electric company investment in smart infrastructure and telecommunications company investment in their own poles. Finally EEI's representatives reiterated the fact that electric companies need access to more spectrum not less.

During the course of the meeting EEI's representatives discussed the attached document entitled "Smart Communities Powered by Smart Connections."

Please contact the undersigned if you have any questions.

Sincerely,

Stinson Leonard Street LLP

H. Russell Frisby, Jr

HF:SLS

Attachment

cc Jay Schwartz

Smart Communities Powered by Smart Connections

Smart communities use data and technology to help drive efficiencies, improve sustainability, spur economic development, and enhance quality of life. As the trend toward smart communities continues to grow, increased electrification and the integration of new and advanced technologies will create new opportunities for collaboration among electric companies, community leaders, technology companies, other business partners, and citizens to achieve these goals.

What Makes Communities Smart?

Smart Buildings

Smart buildings reduce energy waste and operational costs by measuring energy use, pinpointing operations and maintenance problems, automating lighting and thermostats, and tracking building performance. This improves sustainability, saves energy, and helps create a better environment for building occupants.

Smart Street Lighting

Smart street lighting helps communities save energy, lower costs, and reduce maintenance—all while better serving citizens. Smart street lighting also can help communities reduce crime and make parking lots and roadways safer through improved visibility.

Smart Transportation

Smart transportation integrates electrification and digitization with existing community systems to improve safety and mobility and provide greater access to community services. This includes automated and electric vehicles, EV charging infrastructure, and technologies that improve traffic flow.

Distributed Energy Resources

Distributed solar and wind, small natural gas units, electric vehicles, energy storage, and energy management technologies—all connected by the energy grid—are helping communities improve sustainability, efficiency, and reliability.

Data Analytics & Intelligent Services

By analyzing data generated by sensors and monitors, communities can monitor and manage energy use, pedestrian safety, traffic flows, air quality, and more. With the help of intelligent services, such as interactive information kiosks and public Wi-Fi, communities offer residents greater connectivity and access to resources. These technologies and services enable communities to increase efficiency, improve city services, and enhance quality of life for residents.

A Profile of 3 Smart Communities

Columbus, OH

The Columbus smart city project, in partnership with American Electric Power (AEP), features electric shuttles; streetlight sensors that reduce traffic congestion; electric vehicle charging stations to reduce pollution; and even an app under development to help drivers locate empty parking spaces. The project earned Columbus a $40-million smart city grant from the Department of Transportation as part of a competition among 77 cities to implement its vision of an electrified, digitized transportation system. AEP committed an additional $20 million in supportive infrastructure improvements.

San Diego, CA

Smart Cities San Diego is a collaboration among public, private, and academic organizations to develop and implement initiatives that will improve the San Diego region's energy independence, empower customers to embrace clean technologies, reduce greenhouse gas emissions, and drive economic growth. San Diego Gas & Electric (SDG&E) is an active member and has been involved in San Diego's smart city evolution since the beginning.

Spokane, WA

Urbanova is a "living laboratory" created by Avista Utilities that seeks to implement smart city ideas in ways that teach others. Avista is one of six partners, including technology company Itron, Spokane city government, and Washington State University, that have come together to transform the University District into a testing ground for cutting-edge smart city ideas. The 1.2-square-mile area includes six universities, as well as several nearby hospitals, with a good mixture of fully developed and undeveloped or underdeveloped land. This area enables the partners to test key smart city goals—from economic development to sustainability.

Electric companies are not the only players in the smart community movement, but—as managers of the energy grid—they may be the most indispensable.

EEI
Edison Electric INSTITUTE

EEI is the association that represents all U.S. investor-owned electric companies. Our members provide electricity for 220 million Americans, and operate in all 50 states and the District of Columbia. As a whole, the electric power industry supports more than 7 million jobs in communities across the United States. EEI has dozens of international electric companies as International Members, and hundreds of industry suppliers and related organizations as Associate Members.

June 2017